

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION

CHASOM BROWN, et al., on behalf of
themselves and all others similarly situated,

Plaintiffs,

vs.

GOOGLE LLC,

Defendant.

Case No. 4:20-cv-03664-YGR-SVK

~~[PROPOSED]~~ ORDER GRANTING
MOTION TO SEAL

Referral: Hon. Susan van Keulen, USMJ

PATRICK CALHOUN, et al., on behalf of
themselves and all others similarly situated,

Plaintiffs,

vs.

GOOGLE LLC,

Defendant.

Case No. 4:20-cv-05146-YGR-SVK

~~[PROPOSED]~~ ORDER GRANTING
MOTION TO SEAL

Referral: Hon. Susan van Keulen, USMJ

~~PROPOSED~~ ORDER

Before the Court is Google LLC's Administrative Motion to Seal ("Motion") portions of the Joint Status Report Pursuant to *Brown* Dkt. No. 830 and *Calhoun* Dkt. No. 960.

Having considered the Motion, supporting declaration, and other papers on file, and good cause having been found, the Court **ORDERS** as follows:

Documents Sought to Be Sealed	Court's Ruling on Motion to Seal	Reason(s) for Court's Ruling
Joint Status Report Pursuant to <i>Brown</i> Dkt. No. 830; Joint Status Report Pursuant to <i>Calhoun</i> Dkt. No. 960	GRANTED as to the portions at: Pages 1:11-12, 1:14, 1:23, 1:25, 1:28, 2:1-3, 2:5-6, 2:9-10, 2:13-15, 2:18-19, 2:24, 3:5-9, 3:12, 3:19, 4:3-6, 4:8, 4:16, 4:27, 5:2, 5:13, 5:27, 6:13-14, 6:16-22, 6:24-28, 7:1-2, 7:7, 7:9, 7:12	The information requested to be sealed contains non-public, sensitive confidential business information related to Google's internal technological systems that could affect Google's competitive standing and may expose Google to increased security risks if publicly disclosed, including various types of Google's internal projects, internal data sources, and their proprietary functionalities, which Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential information reveals Google's internal systems and operations. Public disclosure of such confidential information could affect Google's competitive standing as competitors may alter their system designs and practices relating to competing products, time strategic litigation, or otherwise unfairly compete with Google.
Exhibit 1 to Trebicka Declaration – Jan. 10, 2023 <i>Brown</i> Hearing Transcript	GRANTED as to the portions at: Pages 7:15-16, 8:9-10, 8:18, 8:21-22, 9:2-3, 9:5, 9:25, 12:5, 12:18, 12:25, 13:4, 15:16-18, 15:25, 16:8, 16:11-12, 17:6, 17:8, 18:6-10, 18:13-16, 18:18, 19:17-18, 20:11, 21:23-24, 22:25, 26:10, 28:10, 28:21-22, 29:1-2, 29:4-7, 29:10-11, 29:16, 30:4, 31:23, 34:22-24, 35:19, 35:22-23, 35:25	The information requested to be sealed contains non-public, sensitive confidential business information related to Google's internal technological systems that could affect Google's competitive standing and may expose Google to increased security risks if publicly disclosed, including various types of Google's internal projects, internal data sources, and their proprietary functionalities, which Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential information reveals Google's internal systems and operations. Public disclosure of such confidential information could affect Google's competitive standing as competitors may alter their system designs and practices relating to competing

1			products, time strategic litigation, or otherwise unfairly compete with Google.
2	Exhibit 2 to	GRANTED as to the	The information requested to be sealed contains
3	Trebicka	portions at:	non-public, sensitive confidential business
4	Declaration – Jan.	Pages 1-6	information related to Google’s internal
5	26, 2023 Letter to		technological systems that could affect Google’s
6	<i>Brown</i> and		competitive standing and may expose Google to
7	<i>Calhoun</i>		increased security risks if publicly disclosed,
8			including various types of Google’s internal
9			projects, internal data sources, and their proprietary
10			functionalities, which Google maintains as
11			confidential in the ordinary course of its business
12			and is not generally known to the public or
13	Exhibit 3 to	GRANTED as to the	Google’s competitors. Such confidential
14	Trebicka	portions at:	information reveals Google’s internal systems and
15	Declaration – Jan.	Pages 1-3	operations. Public disclosure of such confidential
16	28, 2023 Letter to		information could affect Google’s competitive
17	<i>Brown</i> and		standing as competitors may alter their system
18	<i>Calhoun</i>		designs and practices relating to competing
19			products, time strategic litigation, or otherwise
20			unfairly compete with Google.
21	Exhibit 4 to	GRANTED as to the	The information requested to be sealed contains
22	Trebicka	portions at:	non-public, sensitive confidential business
23	Declaration – Jan.	Pages 1-4	information related to Google’s internal
24	30, 2023 Letter to		technological systems that could affect Google’s
25	<i>Brown</i> and		competitive standing and may expose Google to
26	<i>Calhoun</i>		increased security risks if publicly disclosed,
27			including various types of Google’s internal
28			projects, internal data sources, and their proprietary
			functionalities, which Google maintains as

		confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential information reveals Google's internal systems and operations. Public disclosure of such confidential information could affect Google's competitive standing as competitors may alter their system designs and practices relating to competing products, time strategic litigation, or otherwise unfairly compete with Google.
Trebecka Exhibit 5 – Jan. 10, 2023 <i>Calhoun</i> Hearing Transcript	GRANTED as to the portions at: Pages 5:25, 6:2, 6:4, 6:13, 8:1, 8:3, 17:11, 18:20, 18:25, 19:1-2, 21:1, 21:22, 22:21, 25:5, 25:17, 25:20, 25:23, 26:4, 26:8-10, 26:16-17, 28:1	The information requested to be sealed contains non-public, sensitive confidential business information related to Google's internal technological systems that could affect Google's competitive standing and may expose Google to increased security risks if publicly disclosed, including various types of Google's internal projects and internal databases, as well as internal metrics, which Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential information reveals Google's internal systems and operations. Public disclosure of such confidential information could affect Google's competitive standing as competitors may alter their system designs and practices relating to competing products, time strategic litigation, or otherwise unfairly compete with Google.
Trebecka Exhibit 6 – Jan. 23, 2023 Correspondence	GRANTED as to the portions at: Pages 1, 3-4	The information requested to be sealed contains non-public, sensitive confidential business information related to Google's internal technological systems that could affect Google's competitive standing and may expose Google to increased security risks if publicly disclosed, including various types of Google's internal projects and internal databases, which Google maintains as confidential in the ordinary course of its business and is not generally known to the public or Google's competitors. Such confidential information reveals Google's internal systems and operations. Public disclosure of such confidential information could affect Google's competitive standing as competitors may alter their system designs and practices relating to competing products, time strategic litigation, or otherwise unfairly compete with Google.

1 **SO ORDERED.**

2 DATED: March 20, 2023



3 THE HONORABLE SUSAN VAN KEULEN
4 United States Magistrate Judge
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